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CPS Corporation has applied for a Title V/PSD Synthetic Minor operating permit for its Henderson, Kentucky facility. The facility will manufacture flexible packaging through the operation of rotogravure presses. The draft permit has undergone public review for 30 days without any comments from the public. However, the US E.P.A. and the company did submit some comments. The E.P.A. comments were in the form of an e-mail dated Sept. 11, 1998 and the company comments were received as a fax from Environmental Testing & Consulting of the Americas, Inc. (the environmental consultant for CPS) and were dated Sept. 9, 1998. Below is a list of the comments and how they were addressed.

E.P.A. Comments:

Significant Comments:

1. **Practical Enforceability:** In Section B-Emission Point EP07, 401 KAR 59:015 is applicable to EP07. This section of the permit contains emission limitations for Particulate Matter, Visible Emissions and Sulfur Dioxide, however, there are no operating limits for these standards or any mention of, specific monitoring or recordkeeping requirements. Please refer to Kentucky's guidance on monitoring and recordkeeping for Opacity and Particulate Matter emission sources. If it is determined that no monitoring or recordkeeping is required, please indicate the basis for this in the statement of basis.

Response: Operating Limits and Recordkeeping were added to the permit to take the place of any monitoring. This change should make the permit have the practical enforceability which is required.

2. **Missing Applicable Requirement:** In Section B-Emission Point EP07, the Cleaver Brooks Boiler is subject to 40 CFR 60 Subpart Dc - Standards for Small Industrial Commercial-Institutional Steam Generating Units. The boiler was built after June 9, 1989 and has an input heat capacity of 14.65 MMBTU/hr which is between the 10 - 100 MM BTU/Hr range of applicability for the standard. The boiler only burns natural gas therefore, the only additional requirements of the rule are daily recordkeeping for the amount of fuel burned (60.48c(g)). This requirement should be added to the permit.

Response: 40 CFR 60 Subpart Dc requirements were missing and have been added.

3. **Compliance Demonstration:** In Section B-Emission Point EP01, we have concerns about the Compliance Demonstration Method listed under the operating limitations for 401 KAR 59:212. The compliance demonstration sets out several equations that are to be used to find the %VOC (by volume) of volatile portion and % non-volatile material in ink. First, the equations listed for finding the Volume of VOC and Volume of Water are incorrectly labeled. For instance, the first equation is calculating the %VOC (by volume) not the Volume of VOC. The same mistake is made with the Volume of Water equation. Because these quantities are used in subsequent equations, this needs

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to be corrected. Additionally, the calculations contain a list of given and known variables which should be defined for clarity. Finally, the equation which calculates the Density of Solids does not seem to work out dimensionally. The Density of Solids quantity is then used to find the percentage of solids (by volume).

Response: Specific suggestions made were combined with existing material to produce a clearer and more technically accurate compliance demonstration method.

General Comments:

1. The reference in Emission Limitation #3 of Section B-Emission Point EP07 should be more specific. It should read “Section 5(1)(c)(1)” instead of “Section 5(1)(c)”. There are two options in 401 KAR 59:015 Section 5(1)(c) and the permit condition has specifically incorporated the emission limit from 5(1)(c)(1), so the regulation reference should be changed to reflect this.

Response: “Section 5(1)(c)” was changed to “Section 5(1)(c)1”.

2. Throughout the permit, when there are references to Section F, the applicable item number should be specified for clarity. This is occasionally done, but not consistently done with every reference to Section F.

Response: Section F refers to General Conditions and in many instances was in a Section described as being Specific, therefore, for all such occurrences the reference was removed. For all other references to Section F, the applicable item number or numbers were specified.

3. The portion of operating limitations entitled “Synthetic Minor Limitations” should clarify for what standard the facility is trying to become a synthetic minor. The permit application mentions that the source is avoiding PSD requirements. This should be incorporated into the title and used whenever the permit refers to “Synthetic Minor Limitations” (i.e. PSD Synthetic Minor Limitations).

Response: PSD was added to all Synthetic Minor references as requested.

4. The permit should be praised for its use of both operating and emission limitations. Operating Limitation #7 is the practical way to comply with Emission Limitation #2, which incorporates the requirements from 401 KAR 63:022. Operating Limitation #7, controls the lbs/gal content of Ammonia, Isobutyl Alcohol and Monoethanolamine in inks, solvents and cleaning solutions. When this operational limit is combined with the volume usage caps for inks, solvents and cleaning solutions in Operating Limitations #3, #4, and #5, the amount of emissions allowed by the two conditions can be calculated. However, we would like to point out that these emissions are not consistent with the emission limitations for Ammonia, Isobutyl Alcohol and Monoethanolamine in the Emission Limitations #2. Fortunately, the combination of Operating Limitations #3, #4, #5 and

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#7 is stricter than the Emission Limitation #2.

Response: Operating Limitation #7 is not combined with Operating Limitations #3, #4, and #5 to demonstrate compliance with Emission Limitation #2 (yearly limits do not necessarily correlate with hourly limits). Operating Limitation #7 is combined with the rated capacity of the machines to demonstrate compliance with Emission Limitation #2.

As pointed out, given the assumption that all pollutant used is emitted, there is a difference between the emission limit and the operating limit. The permit application summary form has been revised to include reasons for these differences.

CPS Comments:

1. CPS is concerned that gallon restrictions found in the Draft permit, Section B, EP01, Operating Limitations #3, #4, and #5, may make increased production impossible even if innovative improvements in the process which would lower emissions in relation to current production levels are developed and used. CPS also suggests limits to replace Operating Limitations #3, #4, and #5 in the Draft permit.

Response: A simpler and clearer version of the suggested replacement for Operating Limitations #3, #4, and #5 will be used in the proposed permit. Corresponding changes will be made to the permit application summary form and the permit statement of basis. The suggested replacement, although more difficult to practically enforce, should be acceptable.

2. The provisions of Operating Limitations #3, #4, and #5 may “create unnecessarily burdensome recordkeeping procedures” was another comment made by CPS.

Response: The suggested replacement, which is basically going to be used, would have required the same recordkeeping procedures. The replacement which will actually be used will not require any weekly averages to be calculated and should therefore be more acceptable to CPS.

3. CPS prefers that the term “flexible packaging” be utilized in the permit instead of “gift wrap”.

Response: This is acceptable and has been done.

4. CPS suggests that 2 months should be allowed for the retroactive organization of records since the actual date of issuance for the permit “is unknown and thus difficult to arrange advance preparations.”

Response: The request for 2 months was allowed but the 2 months was disconnected from the issuance date of the permit. This has been done by placing fixed dates in the permit.

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The review process has indicated that all regulatory requirements will be met once the above noted changes have been made, and a final determination has been made that a federally enforceable Title V/PSD Synthetic Minor permit, containing requirements insuring continuing compliance with all applicable regulations, should be issued. The draft permit has undergone a period of public review and comments from the company and the US E.P.A. have been addressed. The above noted changes have been made to the draft to include all applicable regulatory and practical enforceability requirements. The draft has also been changed to make some Operating Limitations more flexible (the permit application summary form and permit statement of basis have also been revised to reflect the change). Finally, the draft has been edited to add clarity.